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September 24, 2024

**VIA ECF**

United States District Judge Mary Kay Vyskocil  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 2230  
New York, New York 10007  
Tel.: (212) 805-0200

Re: *BKNS Management LLC, derivatively on behalf of Abbson LLC v. Messner Reeves LLP, et al.*  
Case No. 1:24-cv-05581-MKV

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Dear Judge Vyskocil:

Our firm, Gordon Rees Scully Mansukhani, LLP, represents Defendants Messner Reeves LLP (“Messner Reeves”) and Torben Welch (“Welch”) (collectively, “Defendants”) in the above-referenced matter. We write with consent of counsel for Plaintiff to respectfully request an extension until October 10, 2024, to respond to the Complaint on behalf of Defendants. Pursuant to our communications with Plaintiff’s counsel, we agree to waive service of process. Defendants’ responses to the Complaint are currently due on September 27, 2024. This represents Defendants’ second request for an extension of time in this action. The instant request does not affect any scheduled Court appearance or deadline.

We appreciate the Court’s time and attention to this matter.

Respectfully submitted,

*/s/ Sarah Prager*

Sarah Prager, Esq.  
Joseph Salvo, Esq.

CC: All Counsel of Record via ECF